



June 8, 2006

EX PARTE SUBMISSION

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Ex Parte Contact in Federal-State Joint Board on Universal
Service, CC Docket No. 96-45.

Dear Ms. Dortch:

On June 8, 2006 the undersigned, on behalf of the AdHoc Telecommunications Users Committee, met with Aaron Goldberger, Legal Advisor to Commissioner Deborah Tate, to discuss the matters reflected in the attachment to this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'James S. Blaszak', written over a horizontal line.

James S. Blaszak

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Counsel for
AdHoc Telecommunications
Users Committee

Non-Discriminatory Application Of A Numbers-Based USF Assessment Methodology

- Numbers-based USF assessments should be applied consistently from service to service and from supplier to supplier type.
 - Wireless Family Plan phones
 - Pre-paid wireless phones
 - Centrex
 - Universities
 - Non-profits
 - Telematics
 - Multiple landline numbers on the same account
- Competitive neutrality
- Each special interest concession, none of which have been justified, would increase the standard assessment.

- The Commission should not discourage use of efficiency enhancing broadband through “weighted” assessments on broadband access.
 - Broadband access subscribers will not “get off easy” under a pure numbers-based USF assessment methodology.
 - 1:1 relationship for residential telephone numbers and lines
 - 4:1 relationship for business telephone numbers and lines
 - *Under a “pure” numbers-based assessment methodology business users would pay fully fifty percent (50%) of the USF assessments, even though residential subscribers account for about seventy percent (70%) of non-broadband connections.*
 - Business and residential subscribers should be treated alike except for Lifeline / Linkup subscribers.
 - In an IP-world, networks and applications will converge – for residential and business subscribers.
 - Revenue-based assessments on broadband connections would be ill-advised.
 - Excessive special access rates
 - Bundling, not auditable, and instability
 - Double taxation